

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA v. MICHAEL SLAGER	CASE NO. 2:16 - CR - 378 <u>UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE MEMORANDUM IN SUPPORT OF 28 U.S.C. §2255 MOTION</u>
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Michael Slager, by and through undersigned Counsel, respectfully moves this Court for an Order granting Slager 90 days to file a Memorandum of Law in Support of his §2255 motion. In support, Slager respectfully shows as follows:

1. Slager's sentencing proceedings took place before this Court on December 4 through December 7, 2017. Slager's judgment and sentence were filed by this Court on January 16, 2018. (ECF 141).
2. Slager pursued direct appellate review of his conviction with the Fourth Circuit, and petitioned for certiorari in the Supreme Court. Slager's certiorari petition was denied by the Supreme Court on June 3, 2019. (ECF 166).
3. Slager's one-year statute of limitations period to file his 28 U.S.C. §2255 motion would have expired on June 3, 2020.
4. Slager timely filed a 28 U.S.C. §2255 motion along with this request.
5. Present counsel became involved with this case on or about February 27, 2020. Counsel has endeavored to review the voluminous record in this case since that date. Nevertheless, additional time is required in order to conduct a complete review of the transcripts and records from Slager's state and federal proceedings.
6. Present counsel currently has briefing orders in two pending Fourth Circuit appeals (United States v. Dominique Turner 19-4529, United States v. Marquil Deshawn Ball 19-4851), both of which will require counsel to file briefs within 30 days of today's date. Consequently, additional time will be required in order for counsel to adequately prepare Mr. Slager's §2255 Memorandum.

7. Present counsel does not make this request in order to unreasonably delay these proceedings, but rather to ensure that Slager receives effective and meaningful review of the proceedings to date, and a thorough analysis of potential §2255 issues.
8. Present counsel believes that 90 days should be sufficient time to complete review of the record, and respectfully requests that this Court enter an Order permitting 90 days to file a memorandum in support of Slager's §2255 motion, and any accompanying exhibits, attachments, that Counsel deems necessary to articulate the issues presented therein.
9. Present counsel has consulted with the Government concerning this Motion, and the Government has no objection.

RESPECTFULLY SUBMITTED,

s/ Christopher R. Geel

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May 20, 2020

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the District of South Carolina by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

s/ Christopher R. Geel

Christopher R. Geel (#12432)